

No. 19-1087

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IN THE  
**Supreme Court of the United States**

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CHARLES M. HALLINAN,

*Petitioner,*

v.

UNITED STATES OF AMERICA,

*Respondent.*

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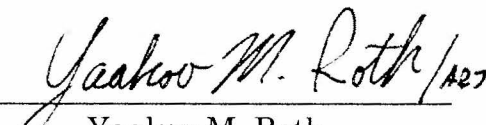
**CERTIFICATE OF COMPLIANCE**

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As required by Supreme Court Rule 33.1(h), I hereby certify that the Brief for *Amicus Curiae* National Association of Criminal Defense Lawyers in Support of Petitioner in *Hallinan v. United States*, No. 19-1087, complies with the word limitations, as it contains 3,142 words.

I declare under penalty of perjury that the foregoing is true and correct.

Date: March 18, 2020

  
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Yaakov M. Roth